



United States
ENVIRONMENTAL PROTECTION AGENCY

Washington, DC 20460

Notice of Inspection

Office of Enforcement and Compliance Assurance

Facility Name <i>Enviro Science Technologies</i>	Facility Address <i>15785 S. Keeler Terr. Olathe, KS. 66062</i>
Name of Facility Official <i>Vinay Patel</i>	Title <i>President</i>

By my signature, I represent that I am an owner, operator or agent in charge of the facility being inspected, and attest that the EPA, Designated State or Political Subdivision Employee or Officer identified on this form presented his or her credentials prior to issuing this Notice of Inspection.

Facility Official's Signature:

Authority for Inspection

For the purpose of inspecting and obtaining samples of any pesticides or devices packaged, labeled and released for shipment, and samples of any containers or labeling for such pesticides or devices, in places where pesticides or devices are held for distribution or sale [FIFRA § 9(a) (7 U.S.C. §136g)]; and for the purpose of inspecting and obtaining copies of those records specified in FIFRA §8 (7 U.S.C. §136f) and 40 C.F.R. Part 169.

Reasons for Inspections (Check applicable boxes)

<input type="checkbox"/> Routine Inspection	Violation Suspected:
<input checked="" type="checkbox"/> For Cause Inspection	<i>Possible production and distribution of unregistered pesticides.</i>

Additional Information:

Name of Inspector <i>Shawn Hackett</i>		
Signature of Inspector <i>Shawn Hackett</i>	Date <i>5-16-17</i>	
Title <i>FIFRA Inspector</i>	Time <i>9:10 AM</i>	
Address <i>11201 Renner Blvd. Lenexa, KS. 66219</i>		

Note: The absence of a Facility Official's signature on this form does not invalidate this Notice of Inspection, or establish that consent to the inspection was not provided or that the proper procedures were not followed.



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Notice of Inspection

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Facility Name Enviro Science Technologies (EST Inc.)	Facility Address 15785 S. Keeler Terr. Olathe, KS. 66062
Name of Facility Official Vinay Patel	Title President

By my signature, I represent that I am an owner, operator or agent in charge of the facility being inspected, and attest that the EPA, Designated State or Political Subdivision Employee or Officer identified on this form presented his or her credentials prior to issuing this Notice of Inspection.

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Reasons for Inspections (Check applicable boxes)

- | | |
|---|------------|
| <input type="checkbox"/> Routine Inspection | Violation |
| <input type="checkbox"/> For Cause Inspection | Suspected: |

Additional Information:

**Continuation of the inspection begun on
5-16-2017.**

Name of Inspector **Shawn Hackett**

Signature of Inspector **Shawn Hackett**

Date **5-25-17**

Title **FIFRA Inspector**

Time **9:10AM**

Address **11201 Renner Blvd. Lenexa, KS. 66219**

Note: The absence of a Facility Official's signature on this form does not invalidate this Notice of Inspection, or establish that consent to the inspection was not provided or that the proper procedures were not followed.



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Receipt for Samples

Office of Enforcement and Compliance Assurance

Facility Name <i>Enviro Science Technologies (EST Inc.)</i>	Facility Address <i>15785 S. Keeler Terr. Olathe, KS. 66062</i>
Name of Facility Official <i>Vinay Patel</i>	Title <i>President</i>

Samples Collected (Assign sample number and describe fully (e.g., product name, size, quantity, registration, establishment, lot, batch, model and/or serial numbers, etc.)) The following samples were collected by or on behalf of the U.S. Environmental Protection Agency and receipt is hereby acknowledged pursuant to Section 9(a) of the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. §136g).

Photographs were taken of the active ingredients used to make the formulated products, and shipping documents for the Magquat MC 1412 50%

Bin & Company Labels Received

*Nano Excel for Herbicide Adj.
Nano Revolution 3.0 for Herbicide
Nano Excel 3rd Generation for Herbicide
Nema-Max 9000
Soil Revitalizer
Insecto-Max
EST Microcide IV
Horticulture Weed Control HWC-2030*

Documents Requested

1 copy of a receiving record ^{SH} of active ingredient for each product listed above.

5 copies of shipping records for Horticulture Weed Control HWC-2030, Nema-Max 9000, Insecto-Max & EST Microcide IV.

<input type="checkbox"/> Duplicate samples requested and provided <i>N/A</i>	<input type="checkbox"/> Duplicate samples not requested	Amount paid <i>N/A</i>	<input type="checkbox"/> Cash <input type="checkbox"/> Credit Card <input type="checkbox"/> No Charge
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Acknowledgement of Samples Collected: The undersigned acknowledges that the samples shown above were obtained from pesticides or devices that were packaged, labeled and released for shipment.

Facility Official Signature <i>Vinay Patel</i>	Date <i>5-16-17</i>
Name of Inspector <i>Shawn Hackett</i>	Title <i>Inspector</i>
Signature of Inspector <i>Shawn Hackett</i>	Date <i>5-16-2017</i>
Address <i>11201 Renner Blvd. Lenexa, KS. 66219</i>	



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Facility Name Enviro Science Technologies (EST Inc.)	Facility Address 15785 S. Keeler Terr. Olathe, KS 66062
Name of Facility Official Vinay Patel	Title President

Samples Collected (Assign sample number and describe fully (e.g., product name, size, quantity, registration, establishment, lot, batch, model and/or serial numbers, etc.)) The following samples were collected by or on behalf of the U.S. Environmental Protection Agency and receipt is hereby acknowledged pursuant to Section 9(a) of the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. §136g).

Receiving records:

Calfax 10L 45 5 pages

NP-9 5 pages

Nexeo Chelating Agent 4 pages

Glycolic Acid 5 pages

Liquid Humic 7 pages

Pro Tec Tor 9 pages

Tri-k Surcide 2 pages

Molasses 7 pages

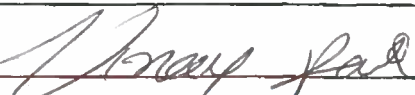
Soybean Oil 5 pages

Maquat MC 1412 50% 2 pages

NP 4 1 page

<input type="checkbox"/> Duplicate samples requested and provided NA	<input type="checkbox"/> Duplicate samples not requested	Amount paid NA	<input type="checkbox"/> Cash <input type="checkbox"/> Credit Card <input type="checkbox"/> No Charge
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Acknowledgement of Samples Collected: The undersigned acknowledges that the samples shown above were obtained from pesticides or devices that were packaged, labeled and released for shipment.

Facility Official Signature 	Date 5-25-17
Name of Inspector Shawn Hackett	Title Inspector
Signature of Inspector Shawn Hackett	Date 5-25-2017
Address 11201 Renner Blvd., Lenexa KS 66219	



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Receipt for Samples

Office of Enforcement and Compliance Assurance

Facility Name Enviro Science Technologies (EST Inc.)	Facility Address 15185 S. Keeler Terr. Olathe KS 66062
Name of Facility Official Vinay Patel	Title President

Samples Collected (Assign sample number and describe fully (e.g., product name, size, quantity, registration, establishment, lot, batch, model and/or serial numbers, etc.)) The following samples were collected by or on behalf of the U.S. Environmental Protection Agency and receipt is hereby acknowledged pursuant to Section 9(a) of the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. §136g).

Distribution Records:

Horticulture Weed Control 3 pages

Nema Max 9000 Plus Soil Revitalizer 3 pages ^{CB} 7 pages

~~Nema Max 9000~~ ^{CB}

Insecto Max (Fly spray) 2 pages

Microcide IV 1 page

Soil Revitalizer 4 pages

<input type="checkbox"/> Duplicate samples requested and provided ^{NA}	<input type="checkbox"/> Duplicate samples not requested	Amount paid ^{NA}	<input type="checkbox"/> Cash <input type="checkbox"/> Credit Card <input type="checkbox"/> No Charge
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Acknowledgement of Samples Collected: The undersigned acknowledges that the samples shown above were obtained from pesticides or devices that were packaged, labeled and released for shipment.

Facility Official Signature <i>Vinay Patel</i>	Date 5/25/17
Name of Inspector Shaun Hackett	Title Inspector
Signature of Inspector <i>Shaun Hackett</i>	Date 5-25-2017
Address 11201 Renner Blvd., Lenexa KS 66219	

REGION 7 PRODUCER ESTABLISHMENT INSPECTION
PRE-SAMPLING INTERVIEW

I. Introduce yourself, show EPA credentials, issue a Notice of Inspection and explain the purpose of the inspection.

II. Company Information

A. Ask for the following info, about the company:

Name EST Inc.
Address 15785 S. Keeler Terr. Olathe, KS 66062
Phone Number 913-764-4900
EPA Est. Number 83240-KS-01

B. Names and Titles of the persons you are interviewing & dealing with:

Name <u>Vinay Patel</u>	Title <u>President</u>
Name <u>Amit Patel</u>	Title <u>Warehouse Manager</u>
Name <u>Josh Hachem</u>	Title <u>Office Asst.</u>
Name _____	Title _____

III. History of the Business

A. When and where incorporated KS corporation Est 2005-06. Grandview KCK
Olathe
Dec 15

B. Significant Mergers

none

C. Related Firms, Name, Address, and Phone Number

none

D. Number of employees at this facility 7 48 office 3 warehouse

IV. Label Agreements/Guarantees: (ask for the names of the companies they have packaging agreements with as applicable dealing with label spec. etc.)

Name of Company Address

none

V. Does the company maintain a consumer complaint file?

If so, where? No

VI. Does the firm currently have any EUP registered with EPA? No

If yes, list products and where they are used.

VII. Manufacturing codes, (both in-plant and when marketed): Explain system.

Does not use a batch code system. Only packages and sells to distributors, not end users.

VIII. Storage conditions. Make observations of the storage area during the sampling process. Ask for an estimation of the size of the storage area.

~40,000 sq.ft.

IX. Child Resistant Packaging.

A. Ask about the company's policy concerning child resistant packaging.

No consumer products packaged.

B. Child resistant packaging label improvement program

X. Promotion and Distribution

A. How and where are the products marketed? Promote through

distributors, brochures, flyers, trade shows

B. How many sales people are employed? Two independent contractor

sales people, are not employees, also employed by the distributors

C. What type of advertising is used? _____

XI. Disposal

A. What happens to broken containers and spilled products? _____

Can dispose of through suppliers, send back to suppliers.

B. Waste formulation. None

XII. When were the products last produced? product produced on a order basis only.

product produced daily but nec. pest products.

What percentage of the business is pesticide related? 1-2%

Obtain an inventory list of products currently in stock.

Complete the Books and Records Maintenance form and collect the following:

- Photograph the complete/container for each product sampled.
- Obtain a bin label for each product sampled.
- Obtain a pesticide production "batch" record for each product sampled.
- Obtain a receiving record of the active ingredients of each product sampled.
- Obtain shipping records (5 sales tickets/invoices) for each product produced.

BOOKS AND RECORDS MAINTENANCE

PRODUCER ESTABLISHMENT INSPECTION

Establishment: <i>Enviro Science Technologies Inc.</i> Address: <i>15785 S. Keeler Terr. Olathe, KS. 66062</i>		Inspection Date: <i>5-16-17 & 5-25-17</i> Inspection No: <i>0516171859001</i>			
RECORDS/DOCUMENTS		40 CFR	MAINTAINED?		RETENTION PERIOD
			Yes	No	
1.	Pesticide Production a. Product name b. EPA Reg. No. or EUP NO. c. Amount per batch & batch identification numbers	169.2(a)		X <i>None</i>	2 years <i>Kept.</i>
2.	Device Production a. Brand Name b. Quantity produced	169.2(b)	N/A		2 years
3.	Receiving a. Brand name of the pesticide or device, or common or chemical name of active ingredient (A.I.) <i>-Yes</i> b. Name & address of shipper <i>-yes</i> c. Name of delivering carrier <i>-yes</i> d. Date received <i>-yes</i> e. Quantities received <i>-yes</i>	169.2(c)	X		2 years
4.	Shipping a. Brand name of the pesticide or device, or common or chemical name of A.I. <i>-yes</i> b. Name & address of consignee <i>-yes</i> c. Where the pesticide is produced under an EUP, special exemption or special local need <i>N/A</i> d. Name of originating carrier <i>-yes</i> e. Date shipped or delivered for shipment <i>-yes</i> f. Quantities shipped or delivered for shipment <i>-yes</i>	169.2(d)	X		2 years
5.	Inventory a. Types & amounts of pesticides or A.I.s b. Quantities of devices in stock	169.2(e)	<i>Inventories by site or purchase record</i>		Replace by current inventory
6.	Advertising for RUPs Copies of all domestic advertising for RUPs to include any advertising the producer has prepared, including any radio or TV scripts for such products.	169.2(f)	N/A		2 years
7.	Guarantee Copies of all guarantees given pursuant 12(a)(2)(C) of the Act	169.2(g)	None		1 year after expiration
8.	Export a. Copies of the specifications or directions of foreign purchaser for production of pesticide, device, or A.I. b. Copies of product labels & labeling c. Copies of signed foreign purchase acknowledgement statements d. Copies of instructions provided to foreign purchasers e. Copies of exporter certification f. Identity of coded research products	169.2(h) 168.75(c)(3) 168.85(a)		X	2 years after expiration of contract

PRODUCER ESTABLISHMENT INSPECTOR

Investigator's Signature: _____



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Statement

Office of Enforcement and Compliance Assurance

I, Vinay Patel am President of Enviro Science Technologies (EST Inc.) located in Olathe, KS. The business began in 2005 and has been located in three places, 2005-2008 in Grandview, MO; 2008-Dec. 2015 on I-35 & Lamar exit in Kansas City, KS; and Dec. 2015 to present at the current location. The business employees 7 people, 4 in the office & 3 in the warehouse. The business does not have any related firms nor any labeling or repackaging agreements with any companies. The firm does not have a batch coding system, batches are made on an as ordered basis. No product that is packaged, labeled, and released for shipment is held in stock. All products are shipped immediately to the customer.

The products we have discussed during the inspection include:

Nano Excel 3rd Generation for Herbicide (An adjuvant)

Nema-Max 9000 / Soil Revitalizer (Max Systems LLC)

Horticultural Weed Control

Insecto-Max

EST Microcide IV

Total Weed Killer 2000 Green - (Old name for Horticultural Weed Control.)

Nano Weed Control (non EPA) - (Old name for Horticulture weed control)

I have provided to the inspectors receiving records of the ingredients in these products. I have also provided to them both bin labels of products (pre-printed) and company labels (printed as needed).

I hereby swear/affirm that the foregoing statement is true to the best of my knowledge.

Signature

Vinay Patel

Title

President

Name

Vinay Patel

Facility

EST Inc.

Address

15785 S. Keeler Terr.

City

Olathe

State

KS.

Zip Code

66062

Subscribed and sworn to before me at (City)

Olathe

State

Kansas

this

25th

day

in the year

2017

day of

May

Signature of Inspector

Shawn Hackett

Address

EPA Region 7, 11201 Renner Blvd. Lenexa, KS 66219

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I have also provided to the inspectors all distribution records of these products since 2012. The inspectors and I also discussed that a small amount of the Magquat MC1412-50% lounce in 100 gallons water, is added to the Liquid Laundry Detergent as a preservative. Currently we are using the Surcide DMDMH instead of the Magquat MC1412-50%.

I hereby swear/affirm that the foregoing statement is true to the best of my knowledge.

Signature <i>Vinay Patel</i>	Title <i>President</i>	
Name <i>Vinay Patel</i>	Facility <i>EST Inc.</i>	
Address <i>15785 S. Keeler Terr.</i>		
City <i>Olathe</i>	State <i>KS.</i>	Zip Code <i>66062</i>
Subscribed and sworn to before me at (City) <i>Olathe</i>		State <i>Kansas</i>
this <i>25th day</i>	in the year <i>2017</i>	day of <i>May</i>
Signature of Inspector <i>Shaun Hackett</i>		
Address EPA Region 7, 11201 Renner Blvd. Lenexa, KS 66219		Page 2 of 2